

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

Texas Eastern Transmission, LP  
Texas Eastern Transmission, LP - Gillis Compressor Station  
Ragley, Beauregard Parish, Louisiana  
Agency Interest Number: 7853  
Activity Number: PER20080001  
Proposed Permit Number: 0320-00016-V2

**I. APPLICANT**

**Company:**

Texas Eastern Transmission, LP - Gillis Compressor Station  
PO Box 1642  
Houston, Texas 77251-1642

**Facility:**

Texas Eastern Transmission LP  
2240 Texas Eastern Rd  
Ragley, Beauregard Parish, Louisiana  
Approximate UTM coordinates are 486.1 kilometers East and 3369.7 kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS**

The Gillis Compressor Station, located in Beauregard Parish, employs two natural gas fired turbines (General Electric Gas Turbine 41301 {EPN E-1} and 41302 {EPN E-2}) to recompress natural gas through transmission lines. The two natural gas fired turbines have two operating scenarios. The first scenario would allow both turbines (E-1 and E-2) to operate in series in low volume mode. The second operating scenario, which has lower emissions, would allow only turbine E-1 to operate in high volume mode. Turbine E-2 does not have capability for dual volume modes. Texas Transmission Company, LP has an emissions cap for the turbines to incorporate the emissions from the two scenarios.

Condensate and wastewater, resulting from compression, along with lube oil and waste lube oil are stored in storage tanks within the facility. The condensate is transported off-site by tank truck. An auxiliary engine (Leroi L3460) is located on-site in the event of loss of electrical power. Fugitive emission from the facility consist of leaks from pipeline components, discrete blow down events and area fugitive emissions from truck loading activities.

Texas Eastern Transmission LP - Gillis Compressor Station is a designated Part 70 source. The following Part 70 permit has been issued to the facility:

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<b>Permit No.</b>	<b>Unit or Source</b>	<b>Date Issued</b>
0320-00016-V1	Gillis Compressor Station	3/24/2004
0320-00016-V1	Gillis Compressor Station (Amendment)	3/21/2005

### III. PROPOSED PROJECT/PERMIT INFORMATION

#### Application

A permit application was submitted on September 23, 2008 requesting a Part 70 operating permit renewal for the Gillis Compressor Station.

#### Project

Texas Eastern Transmission, LP is requesting a permit renewal for the Gillis Compressor Station. No changes were proposed.

#### Proposed Permit

Permit 0320-00016-V2 will be the renewal of Part 70 operating permit 0320-00016-V1 for the Gillis Compressor Station.

#### Permitted Air Emissions

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	4.45	4.45	-
SO <sub>2</sub>	2.28	2.28	-
NO <sub>x</sub>	481.34	481.34	-
CO	87.51	87.51	-
VOC *	14.64	14.64	-

### IV. REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

#### Applicability and Exemptions of Selected Subject Items

See section XI table 2 of the permit.

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**Prevention of Significant Deterioration/Nonattainment Review**

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and Prevention of Significant Deterioration (PSD) do not apply. This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

**Streamlined Equipment Leak Monitoring Program**

None

**MACT Requirements**

None

**Air Quality Analysis**

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

None

**VI. PERIODIC MONITORING**

All periodic monitoring is conducted in accordance with state and federal regulations. See the Specific Requirements Section of the proposed permit for monitoring requirements.

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## **VII. GLOSSARY**

**Carbon Monoxide (CO)** – A colorless, odorless gas, which is an oxide of carbon.

**Maximum Achievable Control Technology (MACT)** – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

**Hydrogen Sulfide (H<sub>2</sub>S)** – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

**New Source Review (NSR)** – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

**Nitrogen Oxides (NO<sub>x</sub>)** – Compounds whose molecules consist of nitrogen and oxygen.

**Organic Compound** – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

**Part 70 Operating Permit** – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

**PM<sub>10</sub>** – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

**Potential to Emit (PTE)** – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

**Prevention of Significant Deterioration (PSD)** – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air

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Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide ( $\text{SO}_2$ ) – An oxide of sulfur.

Sulfuric Acid ( $\text{H}_2\text{SO}_4$ ) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.